

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

(01) NICHOLAS A. TAYLOR,
[DOB: 12/04/1982]

(02) JASON G. TAYLOR,
[DOB: 07/07/1987]

(03) OMAR A. AGUIRRE,
[DOB: 09/14/1969]

(04) ADAM P. VANNATTA,
[DOB: 01/06/1980]

(05) COLBY D. MONKEWICZ,
[DOB: 11/03/1984]

(06) DANNY A. MOSER,
[DOB: 12/23/1970]

(07) LAURA M. SOLA,
[DOB: 12/26/1977]

(08) ALEXIS F. POWER,
[DOB: 05/07/1985]

(09) DEBORAH M. MORRIS,
[DOB: 06/08/1967]

(10) MATHEW D. SMITH,
[DOB: 04/13/1993]

(11) JAMES W. BIRTLE,
[DOB: 05/01/1975]

and

Case No.

COUNT ONE: (All Defendants)

Conspiracy to Distribute a Controlled Substance

21 U.S.C. §§ 841(a)(1), (b)(1)(A) and 846

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT TWO: (Nicholas A. Taylor)

Distribution of a Controlled Substance

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

COUNT THREE: (Nicholas A. Taylor & Jason G. Taylor)

Possession of a Controlled Substance with Intent to Distribute

21 U.S.C. §§ 841(a)(1) and (b)(1)(A) and

18 U.S.C. § 2

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT FOUR: (Nicholas A. Taylor & Jason G. Taylor)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C. § 924(c)(1)(A) and 18 U.S.C. § 2

NLT 5 Years Imprisonment (consecutive)

NMT \$250,000 Fine

NLT 5 Years Supervised Release

Class A Felony

(12) KIMBERLY J. RICHARDSON,
[DOB: 12/10/1970]

Defendants.

COUNTS FIVE & SIX: (Adam P. Vannatta)

Distribution of a Controlled Substance
21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
NMT 20 years Imprisonment
NMT \$1,000,000 Fine
NLT 3 Years Supervised Release
Class C Felony

COUNT SEVEN: (Adam P. Vannatta)

Possession of a Controlled Substance with Intent to Distribute
21 U.S.C. §§ 841(a)(1) and (b)(1)(C)
NMT 20 years Imprisonment
NMT \$1,000,000 Fine
NLT 3 Years Supervised Release
Class C Felony

COUNT EIGHT: (Adam P. Vannatta)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime
18 U.S.C. § 924(c)(1)(A)
NLT 5 Years Imprisonment (consecutive)
NMT \$250,000 Fine
NLT 5 Years Supervised Release
Class A Felony

COUNT NINE: (Colby D. Monkewicz)

Possession of a Controlled Substance with Intent to Distribute
21 U.S.C. §§ 841(a)(1) and (b)(1)(B)
NLT 5 Years Imprisonment
NMT 40 years Imprisonment
NMT \$5,000,000 Fine
NLT 4 Years Supervised Release
Class B Felony

COUNT TEN: (Danny A. Moser)

Possession of a Controlled Substance with Intent to Distribute
21 U.S.C. §§ 841(a)(1) and (b)(1)(A)
NLT 10 Years Imprisonment
NMT Life Imprisonment
NMT \$10,000,000 Fine
NLT 5 Years Supervised Release
Class A Felony

COUNT ELEVEN: (Danny A. Moser)

Felon in Possession of a Firearm

18 U.S.C. §§ 922(g)(1) and 924(a)(2)

NMT 10 Years Imprisonment

NMT \$250,000 Fine

NMT 3 Years Supervised Release

Class C Felony

COUNT TWELVE: (Danny A. Moser)

*Possession of a Firearm in Furtherance of a
Drug Trafficking Crime*

18 U.S.C. § 924(c)(1)(A)

NLT 5 Years Imprisonment (consecutive)

NMT \$250,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT THIRTEEN: (Laura M. Sola)

*Possession of a Controlled Substance with
Intent to Distribute*

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

COUNT FOURTEEN: (Alexis F. Power)

Distribution of a Controlled Substance

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

COUNT FIFTEEN: (Deborah M. Morris)

*Possession of a Controlled Substance with
Intent to Distribute*

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT SIXTEEN: (Mathew D. Smith)

Distribution of a Controlled Substance

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT SEVENTEEN: (Mathew D. Smith)

Possession of a Controlled Substance with Intent to Distribute

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

COUNT EIGHTEEN: (James W. Birtle)

Possession of a Controlled Substance with Intent to Distribute

21 U.S.C. §§ 841(a)(1) and (b)(1)(B)

NLT 5 Years Imprisonment

NMT 40 years Imprisonment

NMT \$5,000,000 Fine

NLT 4 Years Supervised Release

Class B Felony

COUNT NINETEEN: (Kimberly J. Richardson)

Possession of a Controlled Substance with Intent to Distribute

21 U.S.C. §§ 841(a)(1) and (b)(1)(A)

NLT 10 Years Imprisonment

NMT Life Imprisonment

NMT \$10,000,000 Fine

NLT 5 Years Supervised Release

Class A Felony

COUNT TWENTY: (Kimberly J. Richardson)

Possession of a Firearm in Furtherance of a Drug Trafficking Crime

18 U.S.C. § 924(c)(1)(A)

NLT 5 Years Imprisonment (consecutive)

NMT \$250,000 Fine
NLT 5 Years Supervised Release
Class A Felony

FORFEITURE ALLEGATION
21 U.S.C. § 853

\$100 Mandatory Special Assessment Per
Count of Felony Conviction

DEFENDANT NO.	DEFENDANT NAME	COUNTS CHARGED
1	Nicholas A. Taylor	1, 2, 3, 4 & Forfeiture
2	Jason G. Taylor	1, 3, 4 & Forfeiture
3	Omar A. Aquirre	1 & Forfeiture
4	Adam P. Vannatta	1, 5, 6, 7, 8 & Forfeiture
5	Colby D. Monkewicz	1, 9 & Forfeiture
6	Danny A. Moser	1, 10, 11, 12 & Forfeiture
7	Laura M. Sola	1, 13 & Forfeiture
8	Alexis F. Power	1, 14 & Forfeiture
9	Deborah M. Morris	1, 15 & Forfeiture
10	Mathew D. Smith	1, 16, 17 & Forfeiture
11	James W. Birtle	1, 18 & Forfeiture
12	Kimberly J. Richards	1, 19, 20 & Forfeiture

INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE

Between on or about March 1, 2019, and on or about June 24, 2021, in the Western District of Missouri, and elsewhere, NICHOLAS A. TAYLOR, JASON G. TAYLOR, OMAR A. AGUIRRE, ADAM P. VANNATTA, COLBY D. MONKEWICZ, DANNY A MOSER, LAURA M. SOLA, ALEXIS F. POWER, DEBORAH M. MORRIS, MATHEW D. SMITH, JAMES W. BIRTLE, KIMBERLY J. RICHARDSON did knowingly and intentionally combine, conspire,

confederate and agree with each other, and with others both known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute 500 grams and more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A) and 846.

COUNT TWO

On or about February 27, 2020, in the Western District of Missouri, the defendant, NICHOLAS A. TAYLOR, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT THREE

On or about February 9, 2021, in the Western District of Missouri, the defendants, NICHOLAS A. TAYLOR and JASON G. TAYLOR, aiding and abetting each other, did knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about February 9, 2021, in the Western District of Missouri, the defendants, NICHOLAS A. TAYLOR and JASON G. TAYLOR, aiding and abetting each other, in furtherance of a drug-trafficking crime for which they may be prosecuted in a court of the United States as charged in Count Three, that is, possession with intent to distribute methamphetamine, did knowingly and intentionally possess a firearm, to wit: a Barretta 92F, 9mm pistol, bearing Serial Number BER12395Z. All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i)

and Title 18, United States Code, Section 2.

COUNT FIVE

On or about August 1, 2019, in the Western District of Missouri, the defendant, ADAM P. VANNATTA, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SIX

On or about August 5, 2019, in the Western District of Missouri, the defendant, ADAM P. VANNATTA, did knowingly and intentionally distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT SEVEN

On or about May 11, 2021, in the Western District of Missouri, the defendant, ADAM P. VANNATTA, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT EIGHT

On or about May 11, 2021, in the Western District of Missouri, the defendant, ADAM P. VANNATTA, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States as charged in Count Seven, that is, possession with intent to distribute methamphetamine, did knowingly and intentionally possess a firearm, to wit: a Springfield Armory XDS, 9mm semi-automatic hand gun, bearing Serial Number S4946926. All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i).

COUNT NINE

On or about February 23, 2020, in the Western District of Missouri, the defendant, COLBY D. MONKEWICZ, did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT TEN

On or about January 21, 2021, in the Western District of Missouri, the defendant, DANNY A. MOSER, did knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT ELEVEN

On or about January 21, 2021, in the Western District of Missouri, the defendant, DANNY A. MOSER, knowing he had been convicted of a crime punishable by imprisonment for a term exceeding one year, did knowingly possess, in and affecting commerce, a firearm, to wit: a Smith & Wesson, .38 caliber revolver, bearing Serial Number CNM4090, which had been transported in interstate commerce. All violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

COUNT TWELVE

On or about January 21, 2021, in the Western District of Missouri, the defendant, DANNY A. MOSER, in furtherance of a drug-trafficking crime for which he may be prosecuted in a court of the United States as charged in Count Ten, that is, possession with intent to distribute 50 grams or more of methamphetamine (actual), did knowingly and intentionally possess a firearm, to wit: a Smith & Wesson, .38 caliber revolver, bearing Serial Number CNM4090. All in violation of

Title 18, United States Code, Sections 924(c)(1)(A)(i).

COUNT THIRTEEN

On or about December 2, 2020, in the Western District of Missouri, the defendant, LAURA M. SOLA, did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FOURTEEN

On or about July 29, 2020, in the Western District of Missouri, the defendant, ALEXIS F. POWER, did knowingly and intentionally distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT FIFTEEN

On or about February 2, 2021, in the Western District of Missouri, the defendant, DEBORAH M. MORRIS, did knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT SIXTEEN

On or about August 10, 2020, in the Western District of Missouri, the defendant, MATHEW D. SMITH, did knowingly and intentionally distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT SEVENTEEN

On or about September 21, 2020, in the Western District of Missouri, the defendant,

MATHEW D. SMITH, did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT EIGHTEEN

On or about November 12, 2020, in the Western District of Missouri, the defendant, JAMES W. BIRTLE, did knowingly and intentionally possess with the intent to distribute 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

COUNT NINETEEN

On or about February 9, 2021, in the Western District of Missouri, the defendant, KIMBERLY J. RICHARDSON, did knowingly and intentionally possess with the intent to distribute 50 grams or more of methamphetamine (actual), a Schedule II controlled substance. All in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

COUNT TWENTY

On or about February 9, 2021, in the Western District of Missouri, the defendant, KIMBERLY J. RICHARDSON, in furtherance of a drug-trafficking crime for which she may be prosecuted in a court of the United States as charged in Count Nineteen, that is, possession with intent to distribute 50 grams or more of methamphetamine (actual), did knowingly and intentionally possess a firearm, to wit: a Rheinische, .25 caliber pistol, bearing Serial Number 7545. All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i).

FORFEITURE ALLEGATION

The allegations contained in Count 1 of this Indictment are re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to the provisions of Title 21, United States Code, Section 853.

Upon conviction of the controlled substance offense alleged in Count 1 of this Indictment, the defendants shall forfeit to the United States all property, real and personal, constituting, or derived from, proceeds obtained, directly and indirectly, as a result of the violations incorporated by reference in this Allegation and all property used, or intended to be used, in any manner or part, to commit, and to facilitate the commission of the violations alleged in Count 1 of this Indictment, including, but not limited to the following:

1. A money judgment representing all proceeds the defendants obtained directly and indirectly as a result of his or her participation in the drug conspiracy alleged in Count 1;
2. \$12,229 in United States currency seized on January 21, 2021 from Danny A. Moser's person and from a vehicle Danny A. Moser was operating; and
3. \$6,659 in United States currency seized from 4626 NE 47th Street, Kansas City, Missouri 64117, on February 9, 2021.

SUBSTITUTE ASSETS

If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

The United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

All in accordance with Title 21, United States Code, Section 853, and Rule 32.2(a) of the Federal Rules of Criminal Procedure.

A TRUE BILL.

6/24/2021
DATE

/s/ Kathleen Shaw
FOREPERSON OF THE GRAND JURY

/s/ Emily A. Morgan
Emily A. Morgan
Assistant United States Attorney
Western District of Missouri